

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

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DEPUTY CLERK

UNITED STATES OF AMERICA

v.

JONATHAN DENNIS LUDLOW (01)

No. 4:21-CR-4-21CR-348-0

INFORMATION

The United States Attorney Charges:

General Allegations

At all times material to this Information:

1. Defendant **Jonathan Dennis Ludlow** was a Federal Firearms Licensee (“FFL”) with a Type 1 Federal Firearms License issued under the provisions of Gun Control Act (GCA), Title 18 United States Code, Chapter 44, which permitted **Ludlow** to engage in the business of buying, selling, servicing, and transferring firearms. As a Type 1 FFL, **Ludlow** was not permitted to engage in the business of manufacturing firearms.

2. Romello Harris, not named as a defendant herein, was not a holder of a Federal Firearms License, and, therefore, was not authorized to engage in the business of buying, selling, servicing, and transferring firearms.

3. Christopher Meza, not named as a defendant herein, was not a holder of a Federal Firearms License, and, therefore, was not authorized to engage in the business of buying, selling, servicing, and transferring firearms.

Count One

Conspiracy to Deal in Firearms without a License and
Make False Statements on ATF-4473
(Violation 18 U.S.C. § 371 (18 U.S.C. § 922(a)(1)(A), and § 924(a)(1)(A))

4. From on or about January 2021, through on or about July 27, 2021, in the Fort Worth Division of the Northern District of Texas and elsewhere, defendant **Jonathan Dennis Ludlow** knowingly and willfully combined, conspired, confederated, and agreed with others known and unknown, including Romello Harris, and Christopher Meza, not named as defendants herein, to commit certain offenses against the United States, in that, the defendants and others conspired to violate 18 U.S.C. § 922(a)(1)(A) and § 924(a)(1)(A):

- a. defendant **Ludlow** conspired with others for Harris, Meza, and others, not being licensed dealers of firearms, to willfully engage in the business of dealing in firearms, in violation of 18 U.S.C. § 922(a)(1)(A); and
- b. defendant **Ludlow** conspired with others for Harris, Meza, and others, to knowingly make false statements and representations with respect to information on ATF-4473s required to be kept in the records of Federal Firearms Licensee **Jonathan Dennis Ludlow**, in violation of 18 U.S.C. § 924(a)(1)(A).

Objects of the Conspiracy

5. An object of the conspiracy was for **Ludlow** and others to financially profit from the sale of firearms.

6. An object of the conspiracy was to avoid reporting of firearms transactions and the details of those transactions to ATF, so as to avoid detection of the scheme by ATF.

Manner and Means of the Conspiracy

7. The manner and means by which **Ludlow**, Harris, Meza, and others sought to accomplish the objects of the conspiracy included, among other things:

8. **Ludlow** sold large numbers of similar or identical firearms to Harris, Meza, and others. These transactions were conducted in cash and completed out of **Ludlow**'s vehicle, in parking lots around the Northern District of Texas.

9. Harris, Meza, and others engaged in the business of reselling and dealing in **Ludlow**'s firearms to others without a license.

10. **Ludlow**, Harris, Meza, and others, made false statements on ATF-4473s required to be kept in **Ludlow**'s FFL records, so as to avoid detection by ATF, including by avoiding reporting multiple sales of firearms to ATF through Multiple Sale Forms.

Overt Acts in Furtherance of the Conspiracy

11. In furtherance of the conspiracy and to affect its objects, the following overt acts, among others, were committed in the Northern District of Texas and elsewhere, by at least one co-conspirator:

12. On an ATF- 4473 dated 05/23/2021, signed by Harris and **Ludlow**, Harris checked the box stating that he was the actual transferee/buyer of: 1) an IWI, Model UZI Pro, 9mm, S/N U2000935; 2) an Anderson, AM15, Multi-caliber firearm, S/N 21157507; 3) an Anderson, AM15, Multi-caliber firearm, S/N 21120085; 4) an Anderson, AM15, Multi-caliber firearm, S/N 21156740; and 5) an Anderson, AM15, Multi-caliber firearm,

S/N 21157509, when in actuality, Harris and **Ludlow** knew that Harris was purchasing the firearms to resell to another person.

13. On an ATF-4473, dated 07/17/2021, and signed by Meza and **Ludlow**, Meza checked the box stating that he was the actual transferee/buyer of: 1) an Anderson, AM15, Multi Caliber firearm, S/N 21232803; 2) an Anderson, AM15, Multi Caliber firearm, S/N 21232801; 3) an Anderson, AM15, Multi Caliber firearm, S/N 21232808; and 4) a Glock, 27, .40 caliber, pistol, S/N BSRP832, when in actuality, Meza and **Ludlow** knew that Meza was purchasing the firearms to resell to another person.

All in violation of 18 U.S.C. § 371 (18 U.S.C. § 922(a)(1)(A), and §924(a)(1)(A)).

Count Two
Possession of an Unregistered Firearm
(26 U.S.C. § 5861(d) and § 5871)

14. On or about July 27, 2021, in the Fort Worth Division of the Northern District of Texas, defendant **Jonathan Dennis Ludlow** knowingly possessed a firearm which was not registered to him in the National Firearms Registration and Transfer Record, to wit: a black cylindrical device, approximately 6 inches in length and approximately 1-3/8 inches in diameter (Exhibit 221), which is a firearm silencer.

All in violation of 26 U.S.C. § 5861(d) and § 5871.

Forfeiture Notice

(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

15. Upon conviction of any of the offenses alleged in counts one and two of this Information, and under 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), the defendant **Jonathan Dennis Ludlow** shall forfeit to the United States of America any firearm or ammunition involved in or used in the knowing commission of the offense, including but not limited to, firearms, ammunition, and firearm accessories seized from the defendant during the investigation of these offenses.

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